



8/31/2023.”). The Court’s orders did not explicitly extend pending discovery deadlines in individuals matters in which the United States has filed Answers. There are eleven CLJA actions before Honorable Judge Terrence W. Boyle in which the United States has answered complaints but has not completed individual case focused meet and confer discovery conferences with individual plaintiff’s counsel or filed a Fed. R. Civ. P. 26(f) Discovery Plan. *See e.g.* Order for Discovery Plan, *Alifante v. United States*, No. 7:23-cv-982-BO-KS, DE 11 (E.D.N.C. July 18, 2023) (ordering the parties to meet and confer regarding a discovery plan). As noted, however, the Parties have conferred numerous times to discuss a Discovery Plan for the CLJA litigation as a whole. Accordingly, out of an abundance of caution and in light of the pending Proposed Case Management Order (DE 17), the Parties request that the Court extend all pending discovery deadlines in individual cases in which the United States has filed Answers up to and through October 2, 2023.

WHEREFORE, Defendant respectfully submits this Unopposed Motion for Extension and further respectfully request the Court enter the attached Proposed Order briefly extending all individual discovery deadlines pending in CLJA cases in which the United States has filed Answers up to and through October 2, 2023.

DATED this 1st day of September, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2023, a copy of the foregoing document was served on all counsel of record by operation of the court's electronic filing system and can be accessed through that system.

/s/ Adam Bain  
ADAM BAIN